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AmericanMotorcyclist.com

Received & Inspected

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FCC Mail Room

Aole Wilkins  
Office of Engineering and Technology  
Room 7-A431  
Federal Communications Commission  
445 12th S.W.  
Washington, D.C. 20554

Re: Unlicensed National Information Infrastructure (U-NII) Devices in  
the 5 GHz Band [ET Docket No. 13-49]

Dear Aole Wilkins:

The American Motorcyclist Association submits these comments with respect to the above-referenced notice published in the April 10 *Federal Register*. We urge the Federal Communications Commission to consider the U.S. Department of Transportation's need to further test, as described in a report by the National Telecommunication and Information Administration, to determine whether the 5.9 Gigahertz band can be shared without compromising crash-avoidance and connected-vehicle technologies.

As an organization that represents motorcyclists who will share the road with vehicles using these technologies, safety is our utmost priority. Therefore, we agree with the DOT on the need for further testing to ensure vehicles using advanced crash-avoidance and vehicle-to-vehicle technologies are not compromised before adopting the rule authorizing U-NII devices (e.g., Wi-Fi) to operate in the band.

The DOT believes these technologies will reduce the 6 million crashes and more than 30,000 deaths that occur on U.S. roadways annually. According to the NTIA report, and highlighted in an Intelligent Transportation Society of America letter to the FCC, connected-vehicle technology "will enhance safety on the nation's highways," potentially addressing "80 percent of the crash scenarios involving non-impaired drivers." The report also cites National Highway Traffic Safety Administration research showing that connected-vehicle technology "could help prevent the majority of types of crashes that typically occur in the real world, such as crashes at intersections or while changing lanes."

In a landmark study entitled: "Motorcycle Accident Cause Factors and Identification of Countermeasures Volume I: Technical Report," published in 1981, known as the "Hurt Report," the single most common multi-vehicle motorcycle crash involves a car making a left turn into the path of a motorcycle at an intersection. Additionally, in a "Motorcycle Accidents In-Depth Study" (MAIDS), researchers investigated in detail 921 crashes in 1999 and 2000 in France, Germany, the Netherlands, Spain and Italy and found, among other items, that 54.3 percent of the accidents happened at intersections.

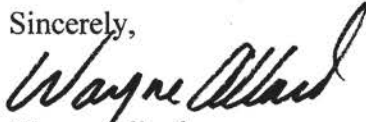
With vehicular intersections already a well-documented problem for motorcyclists, can you imagine the false sense of security that drivers may have who are relying on advanced safety technologies? They may believe these technologies will protect them and other road users, and may not be aware that these technologies could possibly malfunction at this critical juncture.

I would like to offer the AMA as a resource to be included in any discussions involving safety on our nation's highways. The safety of all highway users should always be a priority.

The AMA fully agrees with the ITS of America's letter to the FCC that states: "We support efforts to identify spectrum that may be utilized to expand Wi-Fi applications. But with over 30,000 deaths on our nation's roads every year, we also believe it is critical that efforts to open up additional spectrum do not come at the expense of revolutionary life-saving technologies."

Thank you for the opportunity to provide comments on this important issue to motorcyclists.

Sincerely,

A handwritten signature in black ink, appearing to read "Wayne Allard". The signature is fluid and cursive, with a large, stylized initial "W".

Wayne Allard

Vice President, Government Relations